Vernon H. Crockett
Chief, Industrial Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2059

SUBJ: RCRA Compliance Evaluation Inspection
Phifer, Inc.
EPA ID Number: ALD0040022853

Dear Mr. Crockett:

On November 27, 2017, a U.S. Environmental Protection Agency Compliance Evaluation Inspection was conducted at Phifer, Inc., located in Tuscaloosa, Alabama, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

Apparent violations of RCRA were discovered. Please follow-up with Phifer, Inc. to ensure violations have been addressed.

Enclosed is a copy of the EPA inspection report. If you have any questions regarding this matter, please contact Paula Whiting, of my personnel, by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

Alan A. Annicella
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John L. Stumpff
Safety and Environmental Engineer
Phifer, Inc.
4400 Kauloosa Avenue
Tuscaloosa, Alabama 35403

SUBJ: RCRA Compliance Evaluation Inspection
Phifer, Inc.
EPA ID # ALD0040022853

Dear Mr. Stumpff:

Enclosed is a copy of the U.S. Environmental Protection Agency inspection report documenting the results of the November 27, 2017, inspection of Phifer, Inc. located at 4400 Kauloosa Avenue, Tuscaloosa, Alabama. This was an EPA compliance evaluation inspection (CEI) for the purpose of evaluating the facility's compliance with the applicable Resource Conservation and Recovery Act (RCRA) regulations.

A copy of this report has been forwarded to the Alabama Department of Environmental Management (ADEM) for follow-up.

If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at [HYPERLINK "mailto:whiting.paula@epa.gov."]

Sincerely,

Alan A. Annicella
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

cc: Marlon McMillan, Industrial Hazardous Waste Program, ADEM Land Division

RCRA Inspection Report

1) Inspector and Author of Report

Paula A. Whiting
Environmental Engineer
U.S. Environmental Protection Agency, Region 4
Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-9277

2) Facility Information

Phifer, Inc.
4400 Kauloosa Avenue
Tuscaloosa, Alabama 35403
Tuscaloosa County
EPA ID: ALD0040022853

3) Responsible Official

John L. Stumpff
Safety and Environmental Engineer
Phifer, Inc.
4400 Kauloosa Avenue
Tuscaloosa, Alabama 35403

4) Inspection Participants

John L. Stumpff	Phifer, Inc.
Marlon McMillan	ADEM Land Division
Paula Whiting	US EPA Region 4 Atlanta

5) Date and Time of Inspection

November 27, 2017 at 11:30 a.m. CST

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

ADEM Administrative Code 335 Division 14

Pursuant ADEM Admin. Code r. 335-14-3-.03(5)(d) [40 C.F.R. § 262.34(d)], a generator of greater than 100 kilograms but less than 1,000 kilograms of hazardous waste in a calendar month is a Small Quantity Generator (SQG) and may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.03(5)(d)1-6 [40 C.F.R. § 262.34(d)(1)-(5)] (hereinafter referred to as the "SQG Permit Exemption").

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Phifer, Inc., EPA ID# ALD0040022853 with the applicable regulations.

8) Facility Description

The Phifer, Inc., Tuscaloosa, Alabama is a manufacturer of industrial textiles for insect screens, solar control fabrics, drawn wire, engineered products and designed fabric.

The Metals Division receives 3/8-inch diameter aluminum wire, which is run through a rod mill to ¼-inch diameter wire. The wire is drawn down to the requested diameter and tensile strength using needling ovens and fine wire machines to stretch out the wire. Then the wire is either rolled up and shipped or sent to the Weave Room. In the Weave Room the wire is coated to prevent oxidizing with either a powder coat, electrodeposition coat or a water based paint.

Commented [MMD1]: annealing

The Yarn Coating Division has a proprietary process that extrudes vinyl on fiberglass or copper wire. The facility has fourteen coating lines that are equipped with air pollution control devices. The facility is a major emission source and has a Title V permit.

The Tuscaloosa location has been in operation since 1952 and is also the headquarters for the company. The facility is located on 85 acres with a production area of 40 acres. The facility has 1,400 employees, and operates twenty-four hours a day, three shifts and seven days a week.

Phifer, Inc.'s most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 2, 2017, characterized the facility as a small quantity generator (SQG) of hazardous waste.

Currently Phifer, Inc. may generate hazardous waste streams, used oil, spent lamps, paint waste and other wastes which include EPA Waste Codes D001, U080 and U210.

9) Previous Inspection History

This facility was previously last inspected on November 18, 1999 by ADEM. No violations were found.

10) Findings

Upon arriving at the Phifer, Inc. facility, the inspectors presented their credentials to Mr. Stumpff at 11:30 a.m. CST.

A brief explanation for the purpose of the inspection was given, as well as an introduction of the ADEM and EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then conducted a records review.

Records Review

The inspectors requested the training records, evacuation map, the 2017 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated February 2, 2017.

Mr. Stumpff provided his 2016 training certificate for the Hazardous Waste and DOT Hazardous Material Training course taken on April 7, 2016. The inspectors requested Mr. Stumpff provide his 2017 certificate of hazardous waste training via email. Mr. Stumpff sent in a November 27, 2017 email his Hazardous Waste and DOT Hazardous Materials Training Certificate dated April 6, 2017.

Commented [MMD2]: momentary lapse, lol, not required for SQG. Initial yes but not annual

The emergency response plan evacuation maps were posted in the breakroom through the facility. The inspectors recommended updating the maps to show the location of the external rally point for visitors.

Hazardous and non-hazardous manifests were reviewed for 2017. Hazardous wastes were shipped to Tradebe Treatment and Recycling of Tennessee, LLC (EPA ID TND000772186) in Millington, TN. The land disposal restriction forms were reviewed.

The inspectors observed that manifests 017603695JJK dated July 18, 2017 shipped 2,300 pounds; 017871396JJK dated September 14, 2017 shipped 2,500 pounds; and 015803935JJK dated April 3, 2017 shipped 4,900 pounds exceeded the SQG storage requirement of 2,200 pounds per month. In addition, the inspectors observed that the monthly generation of hazardous waste was not being tracked, but the volume of waste was being estimated prior to shipping. Mr. Stumpff explained that the off-specification coating was considered usable product until the day it is shipped off site. When the decision is made to ship out the off-specification coating three to four 55-gallons drums are filled from Plasticizing Compound Room Tank 19 on the day of shipment. The off-specification coating contains kerosene which generates the EPA Waste Code D001.

The inspectors explained that if the facility wishes to remain SQG then the generation must remain under 2,200 pounds per month. The inspectors recommended that the drums of waste coating be weighed for accuracy and not estimated. The inspectors also explained that the facility can generate up to three drums per month and store the drums for six months prior to shipment. The inspectors cautioned that regardless how the facility decided how store the drums that the facility must consider the other hazardous waste streams (QC Lab waste and crushed fluorescent lamps) generated and stored prior to shipment.

Used oil was shipped to Univar, Universal Refining and Revolutions Environmental.

The inspectors then performed a walk-through inspection of specific areas in the facility. Below is a description of the observations made during the walk-through.

10.1 Yarn Coating Department

The Yarn Coating Department has fourteen coating lines that generate plasticizer precipitation (gold used oil) from the air pollution control devices. Lines 1 and 2 have two 30-gallon drums (Pictures 1-2) assigned to capture the used oil. The remaining coating lines have only one drum per line. No hazardous waste was observed in this area.

10.2 Plasticizing Compound Room

Tank 19 is used to consolidate off-specification vinyl compounding mixing ingredients, coating material generated from color changes in the Yarn Coating Department and the cleaning of the applicators with kerosene prior to a color change (Pictures 3-4). The inspectors observed open 55-gallon drums of off-specification coating underneath Tank 19 (Pictures 5-8). Mr. Stumpff stated that these drums will be added to the tank. The inspectors also observed the floor around Tank 19 was covered in dried off-specification coating.

Across from the tank were two 55-gallons drums capturing coating from leaking equipment (Picture 9). These drums will also be added to Tank 19. Beside the drums on the floor was spilled coating. Mr. Stumpff stated that the spilled coating will be cleaned up before the shift leaves.

In addition to off-specification coating, used kerosene used in the parts washers and the die vibratory cleaners are added to Tank 19.

10.3 QC Laboratory

The QC laboratory generates used oil from lubricant viscosity testing and hazardous waste from lab components. Outside the lab, the inspectors observed a satellite accumulation area with a 55-gallon drum of hazardous lab waste and a 55-gallon drum of used oil incorrectly labeled as "Waste Oil" (Pictures 10-12). The inspectors recommended for clarity that the label be changed to "Used Oil" to properly reflect the contents of the drum.

10.4 Metal Wire Building Lamp Storage

The spent fluorescent lamps are stored in a locked fenced area inside the Metal Wire Building (Pictures 13-20). At the time of the inspection, the inspectors observed spent 4-foot fluorescent lamps stored in 30 open and unlabeled boxes.

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(d)2 [40 C.F.R. § 262.34(d)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.09(4)(a) [40 C.F.R. § 265.173(a)], and is a condition of the SQG Permit Exemption, a generator is required to keep containers of hazardous waste closed when waste is not being added or removed.

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(d)5 [40 C.F.R. § 262.34(d)(4)], which incorporates ADEM Admin. Code r. 335-14-3-.03(5)(a)3. [40 C.F.R. § 262.34(a)(3)], and is a condition of the SQG Permit Exemption, a generator is required to label or clearly mark each container accumulating hazardous waste with the words: "Hazardous Waste."

Mr. Stumpff explained that the lamps were collected and crushed in a bulb crusher by one employee named TC. The bulb crushing system was disconnected from the drum and set aside. A 55-gallon drum was stored next to the open boxes of spent lamps. The drum was full, closed, labeled as hazardous waste but did not a start accumulation date.

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(d)5 [40 C.F.R. § 262.34(d)(4)], which incorporates ADEM Admin. Code r. 335-14-3-.03(5)(a)2. [40 C.F.R. § 262.34(a)(2)], and is a condition of the SQG Permit Exemption, a generator is required to ensure that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

Commented [MMD3]: i didn't cite this because I wasn't sure if they had exceeded the 72 hour window

On November 28, 2017, Mr. Stumpff emailed "*Please find attached our lamp service area in much better condition. Going forward, TC has been instructed to crush every spent lamp accumulated during his shift.*" Attached to the email was a photograph of the cleaned area and the labeled hazardous waste drum.

11) Summary

The inspectors conducted the exit meeting with Mr. Stumpff. During this meeting, the EPA and ADEM presented the preliminary results of the inspection. Phifer, Inc. was inspected as a small quantity generator of hazardous waste. At the time of the inspection, Phifer, Inc. did not appear to be in compliance with some requirements of RCRA.

12) Signed

_____ _____

Paula A. Whiting, Date
Environmental Engineer

Concurrence

_____ _____

Alan A. Annicella, Chief Date
Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

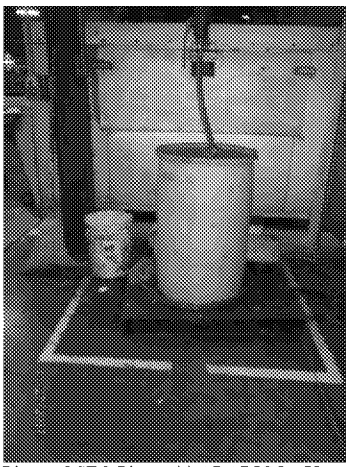
ATTACHMENT A

PHIFER, INC.

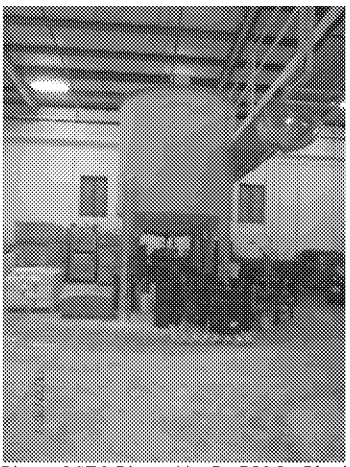
TUSCALOOSA ALABAMA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

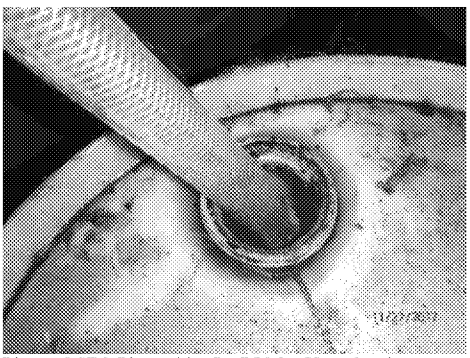
NOVEMBER 27, 2017



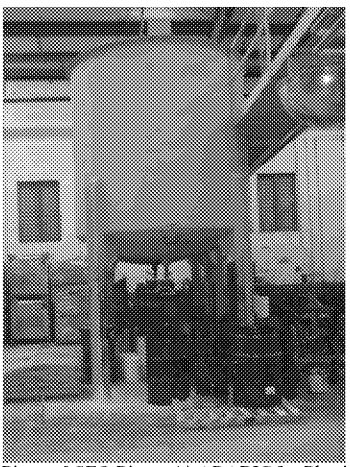
Picture [SEQ Picture * ARABIC] – Yarn Coating Department Line 1 used oil



Picture [SEQ Picture * ARABIC] – Plasticizing Compound Room Tank 19

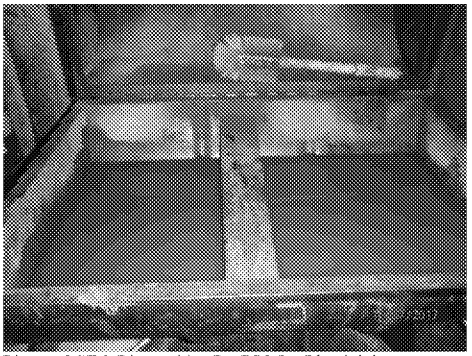


Picture [SEQ Picture * ARABIC] – Yarn Coating Department Line 1 used oil



Picture [SEQ Picture * ARABIC] – Plasticizing Compound Room Tank 19

Picture [SEQ Picture * ARABIC] – Plasticizing Compound Room applicator cleaning drum



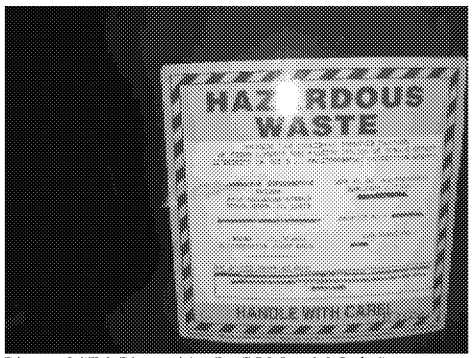
Picture [SEQ Picture * ARABIC] – Plasticizing Compound Room parts washer

Picture [SEQ Picture * ARABIC] – Plasticizing Compound Room color changing drum

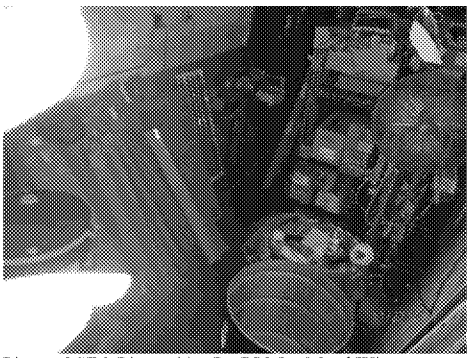
Picture [SEQ Picture * ARABIC] – Plasticizing Compound Room leaking equipment drum

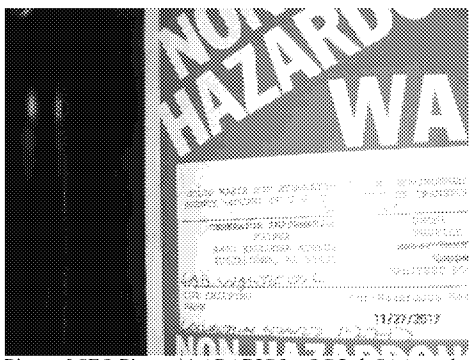
Picture [SEQ Picture * ARABIC] – Plasticizing Compound Room color changing drum

Picture [SEQ Picture * ARABIC] – QC Lab SAA



Picture [SEQ Picture * ARABIC] – QC Lab SAA hazardous waste drum label

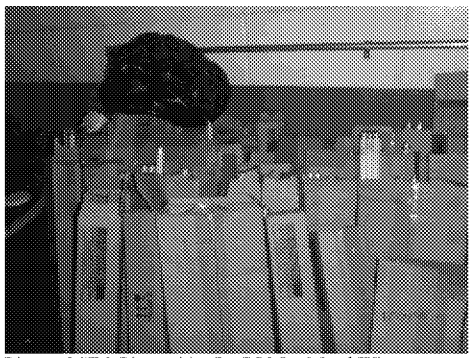

Picture [SEQ Picture * ARABIC] – Metal Wire Building spent lamp storage


Picture [SEQ Picture * ARABIC] – QC Lab SAA used oil drum label


Picture [SEQ Picture * ARABIC] – Metal Wire Building new lamp storage

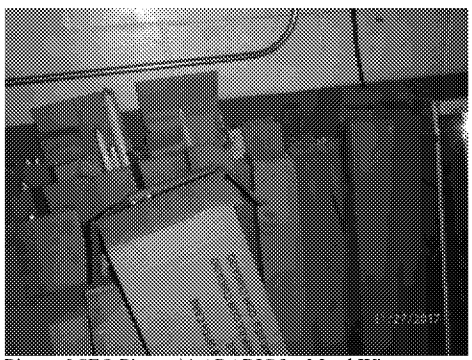

Picture [SEQ Picture * ARABIC] – Metal Wire Building Lamp Storage


Picture [SEQ Picture * ARABIC] – Metal Wire Building spent lamp storage

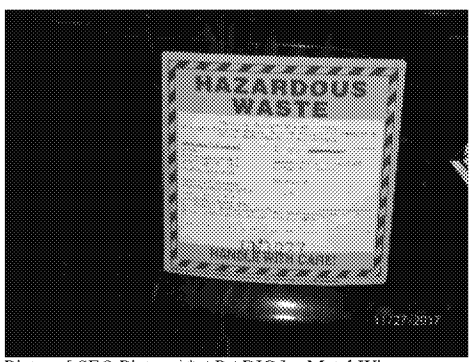


Picture [SEQ Picture * ARABIC] – Metal Wire
Building spent lamp storage

Picture [SEQ Picture * ARABIC] – Metal Wire
Building spent lamp storage



Picture [SEQ Picture * ARABIC] – Metal Wire
Building spent lamp storage



Picture [SEQ Picture * ARABIC] – Metal Wire
Building spent lamp storage drum label